

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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MURAD Y. AMEEN

vs.

AMPHENOL PRINTED CIRCUITS, INC.

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DEPOSITION of PAUL CONNORS,
Deposition taken at Upton & Hatfield,
10 Centre Street, Concord, New Hampshire,
on Monday, June 10, 2013, commencing
at 2:15 p.m.

Court Reporter:
Pamela Carle, LCR, RPR, CRR
New Hampshire LCR No. 98

1 speaking to you about what the day you decided to
2 volunteer what you heard about Mr. --

3 A. Production.

4 Q. He came to talk to you about
5 production?

6 A. Yeah. Whenever he's in and around the
7 area he'll stop in and say how things going, any
8 machine issues, because I run 20 machines in there.
9 So he'll ask if everything's running fine, how are
10 things going, are the hot jobs being addressed,
11 that thing -- that type of nature.

12 Q. And again, sir, just so that I can
13 understand, tell me what it was that caused you to
14 volunteer this information about Mr. Ameen that
15 you weren't being asked about?

16 MS. BROWN: Objection.

17 A. What brought me to say something?

18 BY MS. BURNS:

19 Q. What caused you to volunteer --

20 A. Because cheating on your timecard is
21 not permissible in any company. That's work
22 ethics. I have the work ethics. I wouldn't cheat
23 on my time, and I don't expect other people to do

1 that. It's stealing.

2 Q. Now, Mr. Pratt had his deposition taken
3 in this case, and he testified that he had been
4 down in the drill department talking to you about
5 the need to staff the department and working
6 overtime to hit the company's commitments.

7 A. I don't recall that. I remember him
8 coming in and talking to me about production, but I
9 don't recall the specifics of that conversation.

10 Q. Okay, but I take it you don't have any
11 reason to take issue with the testimony that
12 Mr. Pratt has given under oath if he remembers
13 that he was down in the drill department talking
14 to you about the need to staff the department and
15 working overtime to hit the company's commitments?

16 A. Okay. I agree that he might have been
17 talking about overtime to make the company's
18 commitments.

19 Q. Okay.

20 A. I don't remember, it's a year ago.

21 Q. And Mr. Pratt testified that you seemed
22 a little frustrated about people working within
23 the department not being there, and the need for

1 leaders?

2 A. All group leaders had to work together.

3 Q. Well, did you work well together
4 with --

5 A. I didn't have a problem.

6 Q. -- Mr. Ameen?

7 A. Yes, I felt I did. I had no problem
8 with Mr. Ameen, or Murad. I'm not used to calling
9 him Mr. Ameen.

10 Q. Did anyone ever suggest to you that
11 Mr. Ameen was declining overtime in the spring and
12 into June of 2012?

13 MS. BROWN: Objection.

14 A. No, not really. I noticed he wasn't
15 working, but that's none of my business.

16 BY MS. BURNS:

17 Q. And what did you notice about the fact
18 that Mr. Ameen wasn't working overtime?

19 A. What did I notice? That he wasn't
20 there. Because I worked Saturdays. If Murad's not
21 working -- I would run into him if he was working,
22 is what I'm getting at.

23 Q. So when you were working Saturdays into

1 A. I would assume so.

2 Q. And how much more overtime was it than
3 usual did you have to work during that period of
4 time because they asked you because Mr. Ameen was
5 out with his new baby?

6 MS. BROWN: Objection.

7 A. I generally don't work over eight hours
8 a day. But it was probably, I'd say, maybe two,
9 three times a week that I'd stay until 5:30. And
10 it wasn't an exorbitant amount of time, maybe two
11 or three weeks. And, again, I did not have to
12 stay. It was totally up to me.

13 BY MS. BURNS:

14 Q. But two to three times a week you were
15 working -- instead of working until three you were
16 working until 5:30?

17 A. Instead of working until 3:30 I was
18 working until 5:30, yes; two hours overtime.

19 Q. So you were working an extra six hours
20 a week?

21 A. Yeah, four to six.

22 Q. And what about the Saturdays, were you
23 also covering more Saturdays because Mr. Ameen

1 company?

2 A. I would if they were told -- I was told
3 that they were cheating on their timecard, I would.
4 No, I never had that occurrence before. It never
5 came up.

6 Q. Have you ever had any subordinate
7 employees take extra time beyond their allotted
8 break times?

9 A. Only when asked. They have to elevate
10 to the supervisor saying I'm going to need an extra
11 15 minutes for break, an extra half-hour for lunch,
12 or whatever. But, yes, you can ask your supervisor
13 for more time.

14 Q. Did you ever have to speak to any of
15 your subordinate employees about your belief that
16 they were taking too long for a break?

17 A. I've spoken to a couple of my employees
18 that they were taking extended breaks.

19 Q. Who were they?

20 A. Ray Garrity, Wayne Emon, Frank Brown.
21 If they came back five minutes late from break, I
22 would let them know that they were five minutes
23 late from break and it should not be a repetitive

1 thing.

2 Q. And do Ray Garrity, Wayne Emon and
3 Frank Brown still work there?

4 A. Yes, they work for me.

5 Q. And how many different times did you
6 have to talk to them about taking excess break
7 time?

8 A. Once, so far.

9 Q. When was that?

10 A. It was about a couple of months ago Ray
11 came back late. It was actually three different
12 occurrences because it didn't all happen on one
13 day. Ray came back late one day, I spoke to him
14 about it. Frank came back another day, I spoke to
15 him about it. So if they don't come back in their
16 15 minute time, I talk to them about it.

17 Q. And what was their response when you
18 talked to them about it?

19 A. It won't happen again.

20 Q. And have you been monitoring it?

21 A. Yup. If they're out of -- for break
22 more than their allotted time, I will bring it up
23 to their attention, and if it happens repetitively,

1 I will elevate that to the supervisor.

2 Q. To Mr. Cutter?

3 A. Correct.

4 MS. BURNS: Nothing further. Thank
5 you.

6 MS. BROWN: If we could just have a
7 couple of minutes to confer, we may have a couple
8 of questions for Mr. Connors.

9 (Recess taken.)

10 MS. BROWN: Just a couple of quick
11 questions for Mr. Connors.

12 EXAMINATION

13 BY MS. BROWN:

14 Q. Mr. Connors, you testified that you
15 observed Mr. Ameen on his cellphone. Did you have
16 any indication as to who he was talking to?

17 A. Well, a couple of times he told me he
18 was talking to his brother.

19 Q. And was there any other indication that
20 you had that he was talking to his brother?

21 A. Well, I didn't think he was talking to
22 Joe Silva, because he wasn't speaking English. He
23 was speaking, I assume, his native tongue.